

Category #15:

Safety provisions are necessary for the use of cleaning products and should meet federal wellness policy.

State Response:

The use of green cleaning agents in the workplace does not diminish the requirement for employers to comply with existing OSHA/PESH standards that are designed to protect employees who may be exposed to hazardous cleaning agents. Also, the guidelines have been developed advising school districts on cleaning products that can be used to effectively clean school facilities. This includes proper cleaning and sanitizing of restrooms. Existing regulatory requirements require the public entity to provide workers with the appropriate training and equipment to ensure that necessary precautions are taken to protect workers from blood-borne pathogens as well as other potentially infectious bodily fluids and germs, and those requirements will not be duplicated here.

The federally required wellness policy is geared towards proper child nutrition and health through appropriate food choices and physical exercise. School districts must develop wellness policies to respond to those requirements, but policies could be expanded to cover such topics as appropriate hygiene practices and behaviors. Districts will be encouraged to consider all aspects of healthy behavior when developing a wellness policy.

Frequently Asked Public Comment:**Product Safety Provisions**

--The OGS/Green Seal guidelines do not have provisions for product safety.

(Deirdre Imus, Founder and President, The Deirdre Imus Environmental Center for Pediatric Oncology, Hackensack University Medical Center, The David Joseph Jurist Research Center For Tomorrows Children, Hackensack, NJ 07601)

Dealing with Hazardous Chemicals and Related Issues

--(1) Product "as used" shall not be classified as hazardous under OSHA regulations.

If the MSDS for the "as used" cleaning product states that it is hazardous under OSHA regulations, then it should not be used in the school environment. There is no justification in allowing hazardous chemicals in schools. (2) Cleaning product containing chemicals with low score on Indiana Relative Chemical Hazard Score (IRCHS) to be used in schools. (<http://www.ecn.purdue.edu/CMTI/IRCHS/>.) The IRCHS was formerly known as the Pollution Prevention progress Measurement Method (3P2M)] <http://www.ecn.purdue.edu/CMTI/IRCHS/>. Two U.S. EPA Pollution Prevention Incentives for States (PPIS) grants were awarded in 1994 and 1996 to the Indiana Clean Manufacturing Technology and Safe Materials Institute to develop a method for ranking chemicals by their environmental and workplace hazards. The original name of and acronym for the method, 3P2M, was changed to IRCHS by the Indiana Department of Environmental Management in 1997. A chemical with a low score is considered less hazardous than a chemical with a higher score. The state needs to revise the guidelines, and only allow cleaning products with chemicals that have scored low on the IRCHS.

(Dr. Daniel Lefkowitz, Yorktown Heights, NY)

Improve the Safety, Cleanliness, and Hygiene of Public School Restrooms

--For the last 10 years I have been working to improve the safety, cleanliness, and hygiene of public school restrooms (www.project-clean.com). The NY State efforts will work better if they are coordinated with the "federally" required wellness policy and plan expected in every school district in NY State by 7/1/06. In the many areas of hygiene, including but not limited to the disposal by female students of sanitary products,

any improvement in environmental sensitive products, must also be accompanied by better education, training, and instruction by a variety of faculty members especially in middle and high schools. I know that unless students buy into the state requirements, much will be left undone. Yet I am encouraged that your State initiatives combined with the Federal wellness requirements may be the best opportunity NY State has to establish public school restrooms standards, which are sorely missing now. If my experience or insights after a decade of working on these issues may be useful, please contact. Because I have worked in the western part of NY State and have family there, I am submitting these comments for your review. I look forward to your response and the final regulations. (Dr. Tom Keating, Project-Clean, Decatur, GA)

--The Proposed Guidelines and Specifications: Section VI Cleaning Product Categories, B. Bathroom Cleaners, makes no mention of one of the most contaminated areas in a female restroom, the stall mounted feminine disposal receptacles. According to studies conducted by Dr. Charles Gerba, University of Arizona, Microbiology Department, "Feminine hygiene disposal receptacles have the highest isolation of E coli in female restrooms and the risk of exposure to blood borne pathogens is often overlooked."

Unwrapped blood absorbed pads and tampons can often be found thrown on the floor or stuffed into over-flowing unsanitary receptacles. It is important that students, teachers, staff and custodial crews be provided proper products to minimize their risk of exposure to potentially infectious bodily fluids, germs and bacteria. "OSHA guidelines expect (feminine care items) to be discarded into waste containers which are lined in such a way as to prevent contact with the contents." Budgetary limitations, inconsistent cleaning practices and ineffectiveness of wax liner bags, do not ensure proper hygienic disposal. Women of all ages are disgusted by viewing and fearful of handling previously discarded feminine care products and the resultant unpleasant odors. By intentionally avoiding unsanitary school restroom conditions, students risk possible infections, stained clothing and embarrassing odors from not changing their menstrual pads or tampons during the school day. To steer clear of dirty stall disposal receptacles, women seem willing to chance clogging toilets by flushing feminine care products.

I recommend that the guidelines include alternative types of innovative cleaning products. One such product is SCENSIBLES™, a new single-use feminine hygiene disposal bag, offered by The Scensible Source Co. SCENSIBLES™ are stylishly designed, plastic bags, with tie handle closure and built in antimicrobial agents. SCENSIBLES™ bags provide a way for an individual to totally conceal the contents of a soiled pad, tampon or panty liner. SCENSIBLES™ are packaged for easy one-bag dispensing from refillable stall mounted units.

SCENSIBLES™:

- provide protection and minimizes exposure for users and custodial staff • improves cleanliness • reduce odors

SCENSIBLES™ disposal bags are currently being used in public restrooms, including schools. A facility manager had this to say about SCENSIBLES™, "It's an efficient product that does what it is designed to do."

(Ann Germanow, President, Scensible Source Co. LLC, Rochester, NY)